

Paula A. Barran, OSB No. 80397
pbarran@barran.com
Amy L. Angel, OSB No. 04140
aangel@barran.com
BARRAN LIEBMAN LLP
601 SW Second Ave., Suite 2300
Portland, Oregon 97204-3159
Telephone: (503) 228-0500
Facsimile: (503) 274-1212

Attorneys for Defendant

UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION

ROBERT BRIEDE,

CV. 10-6402 KI

Plaintiff,

v.

24 HOUR FITNESS, USA, INC., a California
corporation,

Defendant.

**DECLARATION OF AMY L.
ANGEL IN SUPPORT OF
DEFENDANT'S SECOND
UNOPPOSED MOTION FOR
EXTENSION OF TIME**

I, Amy L. Angel, being first duly sworn, depose and state as follows:

1. I am one of the attorneys for 24 Hour Fitness, USA, Inc., in the above-captioned matter.
2. The discovery deadline in this case is July 15, 2011.
3. Defendant requests that the deadlines established in this matter be extended as set forth in the motion.

PAGE 1- DECLARATION OF AMY L. ANGEL IN SUPPORT OF DEFENDANT'S
UNOPPOSED MOTION FOR EXTENSION OF TIME

4. The parties are scheduled for a judicial settlement conference with Judge Hubel on July 11, 2011, and will need additional time to complete depositions in the event the mediation fails.

I HEREBY DECLARE THAT THE ABOVE STATEMENT IS TRUE TO THE BEST OF MY KNOWLEDGE AND BELIEF, AND THAT I UNDERSTAND IT IS MADE FOR USE AS EVIDENCE IN COURT AND IS SUBJECT TO PENALTY FOR PERJURY.

DATED this 27th day of May 2011.

s/Amy L. Angel

Amy L. Angel

PAGE 2- DECLARATION OF AMY L. ANGEL IN SUPPORT OF DEFENDANT'S
UNOPPOSED MOTION FOR EXTENSION OF TIME

CERTIFICATE OF SERVICE

I hereby certify that on the 27th day of May 2011, I served the foregoing
**DECLARATION OF AMY L. ANGEL IN SUPPORT OF DEFENDANT'S UNOPPOSED
MOTION FOR EXTENSION OF TIME** on the following parties at the following addresses:

Andrew M. Altschul
Buchanan Angeli Altschul LLP
321 SW 4th Ave., Suite 600
Portland, OR 97204
FAX: (971) 230-0337
andrew@baaslaw.com

by the following indicated method(s) set forth below:

- ☒ **Electronic Filing using the Court's ECF System**
- ☐ **Email**
- ☐ **Facsimile**
- ☐ **First-class mail, postage prepaid**
- ☐ **Hand-delivery**

s/Amy L. Angel

Paula A. Barran
Amy L. Angel

PAGE 3- DECLARATION OF AMY L. ANGEL IN SUPPORT OF DEFENDANT'S
UNOPPOSED MOTION FOR EXTENSION OF TIME